

**HYDE & SWIGART**

Joshua B. Swigart, Esq. (SBN: 225557)  
 josh@westcoastlitigation.com  
 David J. McGlothlin, Esq. (SBN: 253265)  
 david@westcoastlitigation.com  
 2221 Camino del Rio South, Suite 101  
 San Diego, CA 92108  
 Telephone: (619) 233-7770  
 Facsimile: (619) 297-1022

**KAZEROUNI LAW GROUP, APC**

Abbas Kazerounian, Esq. (SBN: 249203)  
 ak@kazlg.com  
 245 Fischer Avenue, Unit D1  
 Costa Mesa, CA 92626  
 Telephone: (800) 400-6808  
 Facsimile: (800) 520-5523

**[Additional Plaintiff's Counsel on Signature Line]**

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

Gail Medeiros, Tracy T.  
 Bomberger, Peter Morrissey, and  
 Julie Pulatlie, individually and on  
 behalf of all others similarly  
 situated,

Plaintiffs,

v.

**HSBC Card Services Inc. and  
 HSBC Technology & Services  
 (USA) Inc.,**

Defendants.

**Case No:** 3:14-cv-01786-JLS-MDD

**Class Action**

**Notice of Motion and Plaintiffs'  
 Unopposed Motion For  
 Preliminary Approval Of Class  
 Action Settlement**

**Date: 8/20/15**

**Time: 1:30 PM**

**Judge: Hon. Janis L. Sammartino**

1 NOTICE IS HEREBY GIVEN that on **Thursday, August 20, 2015 at 1:30**  
2 **PM**, or as soon thereafter as the matter may be heard of the above captioned court,  
3 located at 333 West Broadway, San Diego, CA 92101, Plaintiffs GAIL MEDEIROS  
4 (“Medeiros”), TRACY T. BOMBERGER (“Bomberger”), PETER MORRISSEY  
5 (“Morrissey”) and JULIE PULATIE (“Pulatie” or referred to collectively as  
6 “Plaintiffs”) hereby move the Court pursuant to Federal Rule of Civil Procedure 23  
7 for preliminary approval of the Parties’ Class Action Settlement. Specifically,  
8 through this Motion, the Parties move jointly for certification of a settlement class;  
9 appointment of class counsel and class representatives; preliminary approval of the  
10 Parties’ proposed settlement; and, approval of the Parties’ proposed plan to provide  
11 notice to the class. This Motion is made on the following grounds:

- 12 I. The proposed Class satisfies the requirements of Rule 23 for conditional  
13 certification for settlement purposes only;

14 II. The proposed settlement is the product of non-collusive negotiations and is  
15 fundamentally fair, reasonable and adequate; and hence, warrants  
16 preliminary approval.

17        This motion is based upon the accompanying Memorandum of Points and  
18 Authorities, the exhibits attached thereto, all pleadings and papers on file in this  
19 action and upon such other matters as the Court deems proper.

Respectfully submitted,

# HYDE & SWIGART

Date: July 7, 2015

By: /s/ Joshua B. Swigart  
Joshua B. Swigart, Esq.  
Attorneys for Plaintiffs

1 [Additional Plaintiff's Counsel]

2 LAW OFFICES OF TODD M. FRIEDMAN, P.C.

3 Todd M. Friedman, Esq. (SBN: 216752)

4 tfriedman@attorneysforconsumers.com

5 324 South Beverly Blvd., Suite 725

Beverly Hills, CA 90211

6 Tel: (877) 206-4741

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

